



DEPARTMENT OF THE NAVY

NAVAL STATION NEWPORT
690 PEARY STREET
NEWPORT, RI 02841-1522

IN REPLY REFER TO:

5090
Ser PRR41/435
7 Jun 12

Ms. Louise Brodnitz
Historic Preservation Specialist
Office of Federal Agency Programs
1100 Pennsylvania Avenue, NW,
Suite 803
Washington, DC 20004

Dear Ms. Brodnitz:

The Department of the Navy is proposing a wind energy project at Naval Station (NAVSTA) Newport in Rhode Island to construct wind turbines on Navy property adjacent to Narragansett Bay. The goal of this project is to make the installation more self-sufficient and maximize the Navy's ability to meet or exceed renewable power supply goals set forth in the Energy Policy Act of 2005, Executive Order 13423 and other energy policies and regulations. The intent of this letter is to notify your office of this undertaking in accordance with 36 CFR §800.6, and to solicit your participation in this consultation and as a signatory to our proposed Programmatic Agreement, as described below.

The proposed undertaking will include the construction, operation, maintenance, and decommissioning of wind turbines capable of generating approximately nine megawatts of power. Twelve potential locations are being considered, but turbines will not be constructed at all 12 locations. The final number of locations is anticipated to be between three and six. The final number necessary to achieve the project's purpose will depend upon other factors still to be determined, such as turbine height and power-generating ability, as well as wind potential at each site.

We are currently in consultation with the National Park Service (NPS), the Rhode Island Historical Preservation and Heritage Commission (RIHPHC), the Narragansett Indian Tribe (NIT), and other interested parties. The proposed wind energy project will be awarded as a design-build project; therefore we do not have specifics related to the tower foundations, heights, or the footprint of the associated infrastructure. Since we do not have these design specifics, we cannot make a final determination of effect and will be proposing to develop a Programmatic Agreement with the Advisory Council on Historic Preservation (ACHP) to outline procedures for continued consultation with the appropriate regulatory agencies and interested parties, additional cultural resources surveys that may be required once the design is prepared, and mitigation stipulations for any known adverse

effects. Note that the RIHPHC and other interested parties may be in contact with you to discuss the project and solicit your comments.

Pursuant to the specifications in Section 800.11(e) and (f) of the ACHP regulations and to assist in your review of the proposed undertaking, the available background information on the proposed project is provided below. In addition, we have enclosed the Final Historical Resources Assessment for the NAVSTA Newport Viewshed Study, the Draft Phase 1 Archaeological Survey at Twelve Sites for Proposed Construction of Wind Turbines at NAVSTA Newport, RIHPHC and interested party correspondence on the proposed undertaking, and federally recognized tribe correspondence.

Description of the Undertaking and Area of Potential Effect

The proposed undertaking will include the construction, operation and maintenance, and decommissioning of wind turbines and associated support facilities at 12 potential sites. The potential sites, along with the sizes and number of turbines constructed, will be determined based on analyses that will result in a project best meeting the purpose and need of the Navy while minimizing impacts to cultural resources as determined in consultation with appropriate parties.

The area of potential effect (APE) is two-fold. The primary APE is defined by the footprint of construction activities associated with the installation of the wind turbines. The secondary APE is the viewshed to and from historic properties located on Navy property and in the surrounding communities. The secondary APE of the viewshed was determined through the development of the Historical Resources Assessment for the NAVSTA Newport Viewshed Study to determine the zone of visual influence for each proposed turbine location. The Navy, in consultation with the RIHPHC, then determined the visual effects on surrounding historic properties as a result of the construction of wind turbines at the 12 proposed sites.

Steps Taken to Identify Historic Properties and Description of Effected Historic Properties

Cultural resources surveys completed for NAVSTA have identified four historic districts at this station (not including the district in Fishers Island, New York):

- a. Naval War College (NWC) Historic District on Coasters Harbor Island: Under the name "Original U.S. Naval War College," Founders Hall (Building 10) and Luce Hall (Building 1), both on Coasters Harbor Island, were collectively designated a National Historic Landmark

(NHL) in 1975. The boundaries of the NHL designation also included Mahan and Pringle Halls, and Dewey Field. There is also one building listed on the National Register of Historic Places (NRHP), but not an NHL, which was the NWC President's Quarters. In addition, there are ten structures that contribute to the NRHP-eligible district, which also incorporates the boundaries of the NHL district.

b. Fort Adams National Historic Landmark District: In 1975 the Secretary of the Interior designated the Fort Adams Historic District a NHL. Fort Adams occupies approximately 80 acres (32.4 hectares) on high ground projecting into Narragansett Bay in the southwestern part of Newport. This district encompasses the fort itself, associated buildings, redoubts and batteries (owned by the State of Rhode Island), and the officers' quarters; all but one of which (Building 1, the Eisenhower House), were Navy property.

c. Melville Fuel Depot and Net Depot: Twenty tanks, buildings, or other structures that are contributing resources in this NRHP-eligible district.

d. Naval Hospital Historical District: At this district, eight structures, including the main hospital, contribute to making this property NRHP-eligible.

In addition to the existing cultural resources surveys completed for NAVSTA, the Navy has prepared the following reports as part of the wind energy project. A brief synopsis of the each report is below:

a. Final Historical Resources Assessment for the NAVSTA Newport Viewshed Study

As part of the NAVSTA Newport Viewshed Study, a reconnaissance survey was conducted to identify potentially affected above-ground cultural resources. The survey team traversed all passable publicly owned roads located within the project APE and identified all properties 50 years or older. A spreadsheet was compiled listing all of these properties and all historic properties that were viewable from a public-right-of-way or publicly accessible and fell within the project viewshed were recorded.

Once the reconnaissance survey was completed, Zone of Visual Influence maps were developed to identify the geographic area within which a relatively high probability exists that some portion of one or more wind turbines would be visible. Additionally, photo-simulations of the proposed wind turbines at maximum allowable heights were

prepared from various locations within the APE looking toward the proposed wind turbines, as recommended by the RIHPHC. The photo-simulations were developed by inserting a photo rendering of a three-dimensional computer model of the proposed wind turbines into the base photograph taken from each corresponding resource. The three-dimensional computer model was developed with WindPro Software.

Based on the results of the NAVSTA Newport Viewshed Study, the Navy, in consultation with the RIHPHC, identified several historic properties located in the towns of Newport, Middletown, and Portsmouth on Aquidneck Island; portions of Jamestown on Conanicut Island; and Dyer, Coasters Harbor, Goat, Prudence, and Rose Islands in Narragansett Bay that would be visually affected by the installation of the proposed wind turbines:

- a. U.S. NWC - National Register (NR) listed and NHL historic district including Luce Hall (individually listed NR property).
- b. Newport Historic District - NR listed and NHL district.
- c. Bellevue Avenue NHL District - NR listed and NHL district.
- d. Ochre Point-Cliffs Historic District - NR listed district.
- e. Bellevue Avenue-Casino Historic District - NR listed.
- f. Newport Casino - NHL individual property.
- g. Ocean Drive Historic District - NR listed and NHL district.
- h. Fort Adams Historic District - NR listed and NHL district.
- i. Windmill Historic District - NR listed district.
- j. Jamestown Windmill - NR individually listed.
- k. Rose Island Lighthouse - NR individually listed.
- l. Shoreby Hill Historic District - NR listed.
- m. Newport Naval Hospital Historic District - NR eligible district.

n. Middletown Agricultural District - NR potentially eligible.

Draft Phase 1 Archaeological Survey at Twelve Sites for Proposed Construction of Wind Turbines at Naval Station Newport

The surveyed area encompassed a 150-foot (46-meter) radius around the center point for each of the proposed wind turbine locations. Areas that contained standing water, shoreline, paved surfaces, or heavy disturbances prohibited testing. The fieldwork for the survey was completed in October 2011. A geo-probe core (boring) was taken at each test location before archaeological testing was initiated, except for Bishop's Rock, where a large backhoe trench was used to excavate and observe for stratigraphy. The sub-surface testing involved the excavation of shovel test pits at ten of the 12 site locations at a 15-meter interval with radials excavated around shovel test pits that were positive for prehistoric and historic artifacts. Due to existing site conditions at Katy Field and Bishop's Rock, sub-surface testing was not feasible at these locations. A representative from the NIT Historic Preservation Office was present with the field crew during all geo-probe core sampling and sub-surface excavations.

Testing identified two areas that may require additional testing if selected for construction in order to determine the presence of archaeological features and site eligibility for inclusion in the NR of Historic Places. Archaeological Site #2520 was identified at the Tank Farm 4A site within the southern and central portions of the proposed turbine location. The survey yielded a collection of prehistoric artifacts and determined that possible intact prehistoric features and deposits may be present under the plow zone. Archaeological Site #2519 was identified at Tank Farm 5 to the north and outside of the 150 foot radius of the proposed wind turbine. The site was discovered during a pedestrian reconnaissance survey of the area. A collapsed cellar hole and portion of a stone wall were observed along Greene Lane and are likely the remnants of buildings associated with the middle-to-late nineteenth century farmstead belonging to Dr. Nathanael Greene.

No archaeological sites or features were identified at the remaining proposed wind turbine locations, and no further work is recommended for these locations. Testing determined that the Derektor Shipyard, Navy Lodge, Prichard Field South, and Coddington Point sites are land created through filling marsh lands along the edge of Narragansett Bay in order to extend the shoreline. Prichard Field North, Katy Field, and the Naval Undersea Warfare Center locations have been heavily disturbed with previous grading and fill episodes. Observations of Bishop's Rock indicated no natural soil stratigraphy

and gravel fill over solid bedrock. Lastly, Tank Farm 3 and Tank Farm 4B have been heavily disturbed with the construction of the underground fuel tanks.

Explanation of Why the Criteria of Adverse Effect Found Applicable and Actions to Avoid, Minimize, or Mitigate Adverse Effects for Section 800.11(e) and (f)

The Navy has determined that construction of a wind turbine on one proposed site, Katy Field, would have an adverse visual effect on the setting and character of the U.S. NWC Historic District due to the close proximity of this site to this historic property, which includes Luce Hall. Representatives from the Navy met with the RIHPHC on May 21. During that meeting, the RIHPHC stated that they believe the sites at Katy Field, Bishop's Rock, Prichard Field South, and Prichard Field North would have an adverse visual effect on historic properties. The remaining eight proposed sites were determined to have no adverse visual effect on historic properties; however, for various other reasons, several of these sites are not feasible alternatives. These reasons include decreased wind potential, restrictions placed on tower heights by the Federal Aviation Administration, archaeological concerns, and potential noise and flicker problems due to close proximity to adjacent residences.

It is our understanding that before the RIHPHC submits formal comments to the Navy on its determination of effect, they would like to solicit input from the NPS and your office. The Navy contends that Bishop's Rock, Prichard Field South and Prichard Field North sites would not cause an adverse visual effect to historic properties; however, we will be exploring alternatives for the placement of towers at these sites, including using shorter turbines or placing a single large turbine in this area. The Navy has agreed to eliminate the Katy Field location from further consideration since we have determined that a turbine at this location would cause an adverse effect to the NWC Historic District.

Copies or Summaries of any Views Provided by Consulting Parties and the Public for Section 800.11(e) and (f)

Please see the letters enclosed for input provided by consulting parties to date. Pursuant to 36 CFR §800.2(d), the RIHPHC notified interested parties by letter, on behalf of the Navy, on August 25, 2011. The following interested parties were notified regarding the proposed undertaking: Newport Historic District Commission, Preservation Society of Newport County, Rhode Island Coastal Resources Management Council, RIHPHC, Fort Adams Trust, the Point Association,

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the Rose Island Foundation, Jamestown Historical Society, Newport Restoration Foundation and RIHPHC Commissioner, the International Tennis Hall of Fame and Museum, and Preserve Rhode Island. The NAVSTA Commanding Officer hosted two meetings, on October 28, 2011 and November 17, 2011, with members of the interested parties and the RIHPHC to describe the proposed project. Reference to these meetings and comments submitted by the RIHPHC on behalf of these interested parties is included in the December 19, 2011 letter that is enclosed.

The Navy sent notification letters soliciting input on this project to the following federally recognized tribes: NIT, Wampanoag Tribe of Gayhead Aquinnah (WTGA), and the Mashpee Wampanoag Tribe (MWT). To date, no comments have been received from WTGA or the MWT. Comments have been received from the NIT. Navy correspondence with the tribes is enclosed.

Pursuant to 32 CFR §800.6, please advise us of your decision as to whether you will participate in development of the Programmatic Agreement for this project, as well as any comments you may have at this time, within 15 days of your receipt of this letter. If you have any questions, or would like to schedule an on-site meeting, please contact Shannon Kam at (401) 841-6377 or shannon.kam@navy.mil.

Sincerely,



D. W. MIKATARIAN
Captain, U.S. Navy
Commanding Officer

Enclosure (1): Final Historical Resources Assessment for the Naval Station Newport Viewshed Study, May 2012

Enclosure (2): Draft Phase 1 Archaeological Survey at Twelve Sites for Proposed Construction of Wind Turbines at Naval Station Newport

Enclosure (3): RIHPHC and interested party correspondence

Enclosure (4): Tribal correspondence Proposed Construction of Wind Turbines at Naval Station Newport